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November 29, 2016

Via ECF

Honorable Michael A. Hammer, U.S.M.J.
District Court of New Jersey
Martin Luther King Building & US Courthouse
50 Walnut Street
Newark, NJ 07101



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Re: Casulli v. Ditech Financial, LLC
Civil Action No.: 2:15-cv-07632

Dear Judge Hammer,

As Your Honor may recall, this office represents Plaintiff in the above referenced matter. Fact discovery is scheduled to end in this case on November 30, 2016. The parties jointly request an extension of the discovery schedule as set forth in the May 25, 2016 Pretrial Scheduling Order [ECF 12].

The parties have exchanged paper discovery. In mid October, Plaintiff provided Defendant with a preliminary expert report and settlement demand. Defendant is in the process of reviewing same and the parties intend to continue settlement discussions. The parties have not taken depositions at this time. The new schedule requested is the following:

Fact Discovery to be completed by February 17, 2017;
Plaintiff's Amended Expert Report to be submitted by March 17, 2017;
Defendant's Expert Report to be submitted by April 17, 2017;
Expert Depositions to be completed by May 31, 2017.

I have provided this letter to Defense Counsel Kyle E. Vellutato prior to filing and have obtained consent as to the form of the letter and request for extension of the scheduling order. Should Your Honor have any questions, counsel will make themselves available to discuss.

Respectfully submitted,

/s/ Adam Deutsch

Adam Deutsch, Esq.

cc: Kyle E. Vellutato, Esq.

SO ORDERED

s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: 12/2/16